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February 13, 2015

BY EMAIL AND ECF

Honorable Thomas P. Griesa
United States District Court for
the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *NML Capital, Ltd. v. Republic of Argentina*, No. 14 Civ. 8601;
NML Capital, Ltd. v. Republic of Argentina, No. 14 Civ. 8988.

Dear Judge Griesa:

We write in connection with the motion for partial summary judgment (concerning the *pari passu* clause) filed by NML Capital, Ltd., dated February 3, 2015, and with the consent of plaintiffs, to inform the Court that the parties have agreed to the following briefing schedule:

- The Republic shall have until March 17, 2015, to serve responsive papers.
- Plaintiffs shall have until April 7, 2015, to serve reply papers.

It is our understanding, based on discussions with counsel for NML, that the plaintiffs have agreed that the foregoing schedule shall apply to all plaintiffs who file "me too" motions¹ on or before March 2, 2015, as well those already filed in the following actions (the "Motions"):

- *FFI Fund, Ltd. and FYI Ltd. v. Republic of Argentina*, No. 14 Civ. 8630;

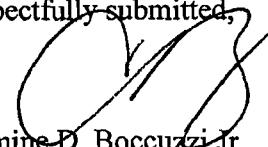
¹ The parties agree that a "me too" motion is any motion that joins NML's Memorandum of Law and that makes no additional arguments. To the extent that a plaintiff files a motion for partial summary judgment that includes arguments not otherwise found in NML's Memorandum of Law, the Republic will coordinate with that plaintiff on an appropriate briefing schedule.

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- *EM Ltd. v. Republic of Argentina*, No. 14 Civ. 8303;
- *Perez, et al. v. Republic of Argentina*, No. 14 Civ. 8242;
- *Lightwater Corp. Ltd. v. Republic of Argentina*, No. 14 Civ. 4092;
- *Old Castle Holdings, Ltd. v. Republic of Argentina*, No. 14 Civ. 4091;
- *Aurelius Capital Partners, LP and Aurelius Capital Master, Ltd., v. Republic of Argentina*, No. 14 Civ. 8946;
- *Blue Angel Capital I LLC v. Republic of Argentina*, No. 14 Civ. 8947;
- *Settin v. Republic of Argentina*, No. 14 Civ. 8739;
- *Capital Ventures International v. Republic of Argentina*, No. 14 Civ. 7258;
and
- *Adami, et al. v. Republic of Argentina*, No. 14 Civ. 7739.

Pursuant to Rule 1.F of the Court's individual practices, the parties represent that this is the first request for an extension of the briefing schedule for the Motions.

We respectfully requests that the Court so-order the proposed schedule.

Respectfully submitted,

Carmine D. Boccuzzi Jr.

cc: Counsel of Record (by ECF)

SO ORDERED:

U.S.D.J.